

Joyce W. Lindauer  
State Bar No. 21555700  
Joyce W. Lindauer Attorney, PLLC  
1412 Main Street, Suite 500  
Dallas, Texas 75230  
Telephone: (972) 503-4033  
Facsimile: (972) 503-4034  
Attorneys for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>IN RE:</b>	§	
	§	
<b>ISMAIL ESSA BHAI,</b>	§	<b>CASE NO. 23-30690-7</b>
	§	
<b>Debtor.</b>	§	<b>Chapter 7</b>

**MOTION TO WITHDRAW AS COUNSEL FOR DEBTOR**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Joyce W. Lindauer Attorney, PLLC, counsel for Ismail Essa Bhai (“Debtor”), the Debtor in the above styled and referenced bankruptcy case requesting to withdraw as counsel in this case and would respectfully show the Court as follows:

1. Joyce W. Lindauer Attorney, PLLC (“Counsel”) desires to withdraw as counsel for Debtor.
2. Mr. Bhai has no ability at this time to pay for the services of his Counsel in these proceedings.
3. A copy of the motion to withdraw was emailed to the Debtor, Ismail Essa Bhai on July 19, 2024.
4. The Debtor is not opposed to the withdrawal of Joyce W. Lindauer Attorney, PLLC as counsel in this case. He intends to seek new counsel.
5. The last known address for the Debtor is 2216 Glacier Court, Carrollton, Texas 75006.

6. Rule 1.15(b) of the Texas Disciplinary Rules of Professional Conduct (“TDRPC”) permits a lawyer to withdraw from representation in certain circumstances. Withdrawal is justified if the client refuses, after being duly warned, to abide by the terms of an agreement relating to the representation, such as an agreement concerning fees or court costs or an agreement limiting the objectives of the representation.

7. Furthermore, withdrawal permitted by paragraph Rule 1.15 (b)(2) through (7) of the TDRPC is optional with the lawyer even though the withdrawal may have a material adverse effect upon the interests of the client. To avoid any such harm Counsel has confirmed that Debtor intends to find new counsel immediately and will cooperate with such replacement counsel to ensure the transfer of any and all client records.

WHEREFORE PREMISES CONSIDERED Joyce W. Lindauer Attorney, PLLC requests the Court permit its withdrawal in this pending proceeding and for such other and further relief to which it may be entitled.

Dated: July 19, 2024.

Respectfully submitted,

/s/ Joyce W. Lindauer  
Joyce W. Lindauer  
State Bar No. 21555700  
Joyce W. Lindauer Attorney, PLLC  
1412 Main Street, Suite 500  
Dallas, Texas 75202  
Telephone: (972) 503-4033  
Facsimile: (972) 503-4034  
ATTORNEY FOR DEBTOR

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that on July 19, 2024, a member of her staff, Laurance Boyd, emailed Charles Hendricks and Emily S. Wall, counsel for Chapter 7 Trustee Anne Elizabeth Burns, regarding the relief requested herein. Ms. Wall responded that her client was unopposed to the withdrawal of counsel.

The undersigned also hereby certifies that on July 19, 2024, she communicated by email with Ismail Essa Bhai, Debtor, regarding the relief requested herein, who indicated that he was unopposed to such relief.

\_\_\_\_\_  
/s/ Joyce W. Lindauer  
Joyce W. Lindauer

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 19, 2024, a true and correct copy of the foregoing document was served via email pursuant to the Court's ECF system and United States first class mail, postage prepaid, as indicated, upon the parties listed below.

**VIA FIRST CLASS MAIL, POSTAGE PREPAID**

Ismail Essa Bhai  
2216 Glacier Court  
Carrollton, Texas 75006

**VIA ECF:**

Charles B. Hendricks, on behalf of Anne Elizabeth Burns, Chapter 7 Trustee  
[chuckh@chfirm.com](mailto:chuckh@chfirm.com)

Emily S. Wall, on behalf of Anne Elizabeth Burns, Chapter 7 Trustee  
[ewall@chfirm.com](mailto:ewall@chfirm.com)

Adam Herring, on behalf of Anne Elizabeth Burns, Chapter 7 Trustee  
[adam.herring@nelsonmullins.com](mailto:adam.herring@nelsonmullins.com)

Joyce W. Lindauer on behalf of Debtor Ismail Essa Bhai  
[joyce@joycelindauer.com](mailto:joyce@joycelindauer.com), [dian@joycelindauer.com](mailto:dian@joycelindauer.com)

\_\_\_\_\_  
/s/ Joyce W. Lindauer  
Joyce W. Lindauer